

EXHIBIT 68

Andrew Willins

From: Gumbs, Lynelle <Lynelle.Gumbs@harneys.com>
Sent: 16 November 2020 07:34
To: Andrew Willins; Mellor, Anjali
Cc: Toi King
Subject: [EXTERNAL] RE: Invoice Attached - Docs for Bravo Luck [APPLEBY-VG_LEGAL.FID184031] [HARNEYS-BVI.HCS.BRAVOLUCKL]

This Message originated outside your organization.

CONFIDENTIAL

Good Morning Andrew

Receipt of your email is hereby acknowledged.

We also confirm receipt of the cheque and apologise that I did not come back on it.

Please note that HCSL will follow the direction of the court.

Kind regards

Lynelle Gumbs

Corporate Services Assistant Manager | British Virgin Islands

D +1 284 852 4344 | **E** lynelle.gumbs@harneys.com

harneysfiduciary.com | harneys.com



British Virgin Islands | Cayman Islands | Cyprus | Hong Kong | London | Miami | Montevideo | São Paulo | Shanghai | Singapore | Vancouver

Harneys Corporate Services Limited, Craigmuir Chambers, PO Box 71, Road Town, Tortola VG1110, British Virgin Islands.
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From: Andrew Willins
Sent: 14 November 2020 17:06
To: Gumbs, Lynelle ; Mellor, Anjali
Cc: Toi King
Subject: RE: Invoice Attached - Docs for Bravo Luck [HARNEYS-BVI.HCS.BRAVOLUCKL] [APPLEBY-VG_LEGAL.FID184031]

EXTERNAL EMAIL

Lynelle and Anjali,

I hope you received the cheque safely.

There is an interim return date in these proceedings on 19 November, and I anticipate asking the Court for permission to use this disclosure in proceedings in New York. We already have such a permission in relation to disclosures provided by the previous agent of Bravo Luck, and it seems to us appropriate that the materials before that court are complete.

Could I ask you to confirm whether HCSL would have any objection to such an order?

Many thanks,
Andrew

Andrew Willins
Partner, Practice Group Head | Dispute Resolution
Appleby (BVI) Limited
Tel: +1 284 393 5323

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From: Gumbs, Lynelle [<mailto:Lynelle.Gumbs@harneys.com>]
Sent: 04 November 2020 13:21
To: Andrew Willins
Cc: Toi King
Subject: [EXTERNAL] RE: Invoice Attached - Docs for Bravo Luck [APPLEBY-VG_LEGAL.FID184031] [HARNEYS-BVI.HCS.BRAVOLUCKL]

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Great – thanks Andrew!

Lynelle Gumbs
Corporate Services Assistant Manager | British Virgin Islands

D +1 284 852 4344 | **E** lynelle.gumbs@harneys.com

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From: Andrew Willins
Sent: 04 November 2020 14:12
To: Gumbs, Lynelle
Cc: Toi King
Subject: RE: Invoice Attached - Docs for Bravo Luck [HARNEYS-BVI.HCS.BRAVOLUCKL] [APPLEBY-VG_LEGAL.FID184031]

EXTERNAL EMAIL

Lynelle

Copying Toi, who will be sending a cheque your way by messenger shortly.

Kind regards
Andrew

Andrew Willins
Partner, Practice Group Head | Dispute Resolution
Appleby (BVI) Limited
Tel: +1 284 393 5323

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From: Gumbs, Lynelle [<mailto:Lynelle.Gumbs@harneys.com>]
Sent: 03 November 2020 13:55
To: Andrew Willins
Subject: [EXTERNAL] RE: Invoice Attached - Docs for Bravo Luck [APPLEBY-VG_LEGAL.FID184031] [HARNEYS-BVI.HCS.BRAVOLUCKL]

This Message originated outside your organization.

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Thanks Andrew.

I am here if you need anything else.

Have a good afternoon!

Lynelle Gumbs
Corporate Services Assistant Manager | British Virgin Islands

D +1 284 852 4344 | E lynelle.gumbs@harneys.com

Harneys Corporate Services Limited, Craigmuir Chambers, PO Box 71, Road Town, Tortola VG1110, British Virgin Islands.
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From: Andrew Willins
Sent: 03 November 2020 14:53
To: Gumbs, Lynelle
Subject: RE: Invoice Attached - Docs for Bravo Luck [HARNEYS-BVI.HCS.BRAVOLUCKL] [APPLEBY-VG_LEGAL.FID184031]

EXTERNAL EMAIL

Thanks. I've sent it off for payment already – hopefully should follow soon.

Kind regards
Andrew

Andrew Willins
Partner, Practice Group Head | Dispute Resolution
Appleby (BVI) Limited
Tel: +1 284 393 5323

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From: Gumbs, Lynelle [<mailto:Lynelle.Gumbs@harneys.com>]
Sent: 03 November 2020 13:47
To: Andrew Willins
Subject: [EXTERNAL] RE: Invoice Attached - Docs for Bravo Luck [APPLEBY-VG_LEGAL.FID184031] [HARNEYS-BVI.HCS.BRAVOLUCKL]

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Here you go Andrew.

Lynelle Gumbs
Corporate Services Assistant Manager | British Virgin Islands

D +1 284 852 4344 | E lynelle.gumbs@harneys.com

Harneys Corporate Services Limited, Craigmuir Chambers, PO Box 71, Road Town, Tortola VG1110, British Virgin Islands.
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From: Andrew Willins <awillins@applebyglobal.com>

Sent: 03 November 2020 14:24

To: Gumbs, Lynelle <Lynelle.Gumbs@harneys.com>

Subject: RE: Invoice Attached - Docs for Bravo Luck [HARNEYS-BVI.HCS.BRAVOLUCKL] [APPLEBY-VG_LEGAL.FID184031]

EXTERNAL EMAIL

Thanks, Lynelle.

Do you think you could address this to Appleby, otherwise it won't get past our finance team!

Kind regards

Andrew

Andrew Willins
Partner, Practice Group Head | Dispute Resolution
Appleby (BVI) Limited
Tel: +1 284 393 5323

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From: Gumbs, Lynelle [<mailto:Lynelle.Gumbs@harneys.com>]

Sent: 03 November 2020 12:22

To: Andrew Willins

Subject: [EXTERNAL] Invoice Attached - Docs for Bravo Luck [APPLEBY-VG_LEGAL.FID184031] [HARNEYS-BVI.HCS.BRAVOLUCKL]

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Hi Andrew

See our invoice as requested for settlement.

If I can help with anything else, please let me know.

Kind regards

Lynelle Gumbs

Corporate Services Assistant Manager | British Virgin Islands

D +1 284 852 4344 | **E** lynelle.gumbs@harneys.com

Harneys Corporate Services Limited, Craigmuir Chambers, PO Box 71, Road Town, Tortola VG1110, British Virgin Islands.
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From: Gumbs, Lynelle

Sent: 03 November 2020 09:20

To: 'Andrew Willins' <awillins@applebyglobal.com>

Cc: Munro, Ross <ross.munro@harneys.com>; Mellor, Anjali <anjali.mellor@harneys.com>; Payne, Macia <macia.payne@harneys.com>

Subject: RE: Final Emails & Attachments - Docs for Bravo Luck [APPLEBY-VG_LEGAL.FID184031] [HARNEYS-BVI.HCS.BRAVOLUCKL]

CONFIDENTIAL

Good Morning Andrew

Had a second look but unfortunately there is no evidence of any instruments of transfer on files.

I will provide our invoice in a short while.

Kind regards

Lynelle Gumbs

Corporate Services Assistant Manager | British Virgin Islands

D +1 284 852 4344 | **E** lynelle.gumbs@harneys.com

Harneys Corporate Services Limited, Craigmuir Chambers, PO Box 71, Road Town, Tortola VG1110, British Virgin Islands.
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From: Gumbs, Lynelle

Sent: 02 November 2020 19:13

To: 'Andrew Willins' <awillins@applebyglobal.com>

Cc: Munro, Ross <ross.munro@harneys.com>; Mellor, Anjali <anjali.mellor@harneys.com>; Payne, Macia <macia.payne@harneys.com>

Subject: RE: Final Emails & Attachments - Docs for Bravo Luck [APPLEBY-VG_LEGAL.FID184031] [HARNEYS-BVI.HCS.BRAVOLUCKL]

Hi Andrew

I don't recall seeing any transfer instruments but let me have another go at our file in the morning.

I will come back tomorrow.

Regards

Lynelle Gumbs

Corporate Services Assistant Manager | British Virgin Islands

D +1 284 852 4344 | E lynelle.gumbs@harneys.com

Harneys Corporate Services Limited, Craigmuir Chambers, PO Box 71, Road Town, Tortola VG1110, British Virgin Islands.
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From: Andrew Willins <a.willins@applebyglobal.com>

Sent: 02 November 2020 4:22 PM

To: Gumbs, Lynelle <Lynelle.Gumbs@harneys.com>

Cc: Munro, Ross <Ross.Munro@harneys.com>; Mellor, Anjali <Anjali.Mellor@harneys.com>; Payne, Macia <macia.payne@harneys.com>

Subject: RE: Final Emails & Attachments - Docs for Bravo Luck [HARNEYS-BVI.HCS.BRAVOLUCKL] [APPLEBY-VG_LEGAL.FID184031]

EXTERNAL EMAIL

Lynelle

This is much appreciated, thank you.

Don't forget to send me a note of your charges. It would also be helpful if you could confirm whether you have any Instruments of Transfer on file (if you still have access to that data room, was anything of that description uploaded there, or did you download everything that was on it)?

Many thanks

Andrew

Andrew Willins
Partner, Practice Group Head | Dispute Resolution
Appleby (BVI) Limited
Tel: +1 284 393 5323

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From: Gumbs, Lynelle [<mailto:Lynelle.Gumbs@harneys.com>]

Sent: 02 November 2020 16:47

To: Andrew Willins

Cc: Munro, Ross; Mellor, Anjali; Payne, Macia

Subject: [EXTERNAL] Final Emails & Attachments - Docs for Bravo Luck [APPLEBY-VG_LEGAL.FID184031] [HARNEYS-BVI.HCS.BRAVOLUCKL]

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Name of Company BRAVO LUCK LIMITED 尚運有限公司
Company Number 1767862

REGISTER OF DIRECTORS
(For Individual Director)

Date of Appointment	Full Name	Former Name or Alias (if any)	Date and Place of Birth	Nationality and ID/PPT No.	Address for the service of documents	Usual residential address (if different from the address for the service of documents)	Occupation	Date of Cessation	Entry Made By
22 July 2013	GUO Qiang 郭強	Nil	22 Feb 1987 and China	Chinese HKID [REDACTED]	Majestic View Manor, 20 South Bay Road, Hong Kong		Merchant		Stevensec Limited

Page No. PLEASE NOTE

(1) THE FIRST REGISTERED AGENT OF THE COMPANY SHALL, WITHIN 6 MONTHS FROM THE DATE OF INCORPORATION OF THE COMPANY, APPOINT ONE OR MORE PERSONS AS THE FIRST DIRECTORS OF THE COMPANY. THE ORIGINAL OR COPY OF THIS REGISTER MUST BE KEPT AT THE OFFICE OF THE COMPANY'S REGISTERED AGENT. IF A COPY THEN PLEASE NOTIFY THE REGISTERED AGENT IN WRITING OF THE PHYSICAL ADDRESS OF THE ORIGINAL.

(2) THE INITIAL COPY OF THE REGISTER OF DIRECTORS SHALL BE FILED FOR REGISTRATION BY THE REGISTRAR WITHIN 21 DAYS OF THE APPOINTMENT OF FIRST DIRECTORS, ANY SUBSEQUENT CHANGES IN THE REGISTER WILL ALSO NEED TO BE FILED WITHIN 30 DAYS OF ANY CHANGES OCCURRING.

BVI 2016

EMM 110

Name of Company **BRAVO LUCK LIMITED 尚運有限公司**
Company Number **1767862**

REGISTER OF MEMBERS

Full Name	GUO Qiang 郭強			Occupation	Director				Date Entered as a Member			22 July 2013	
Address	Majestic View Manor, 20 South Bay Road, Hong Kong					Date of Ceasing to be Member							
Date	Shares Acquired				Shares Transferred					Total Shares Held	Remarks	Entry Made By	
	Certificate Number	Distinctive Nos.		No. of Shares	Consideration Paid	No. of Transfer Deed	Certificate Number	Distinctive Nos.		No. of Shares	Consideration Paid		
22 July 2013	1	-1-	-	-1-	US\$1.00							-1-	Stevensec Limited

Full Name	KWOK Ho Wan 郭浩云			Occupation	Merchant				Date Entered as a Member			26 January 2015	
Address	Majestic View Manor, 20 South Bay Road, Hong Kong					Date of Ceasing to be Member							
Date	Shares Acquired				Shares Transferred					Total Shares Held	Remarks	Entry Made By	
	Certificate Number	Distinctive Nos.		No. of Shares	Consideration Paid	No. of Transfer Deed	Certificate Number	Distinctive Nos.		No. of Shares	Consideration Paid		
26 Jan 2015	2	-2-	-	-1-	US\$1.00								

Page No.	1	Class of Share	Ordinary	Par Value Per Share	US\$1.00
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PLEASE NOTE: THE ORIGINAL OR COPY OF THIS REGISTER MUST BE KEPT AT THE OFFICE OF THE COMPANY'S REGISTERED AGENT. IF A COPY THEN PLEASE NOTIFY THE REGISTERED AGENT IN WRITING OF THE PHYSICAL ADDRESS OF THE ORIGINAL.

BVI 06



BRITISH VIRGIN ISLANDS

Form: DDBVI - P2

Due Diligence Verification of Identity Form for Individual Clients

The information below is required to comply with the Anti-Money Laundering Laws of the relevant jurisdiction, and to eliminate the risk that the legal operation of your company is affected in the future.

Name of Company:	BRAVO LUCK LIMITED		
Nature of Business: (please '✓' as appropriate)			
(i) <input type="checkbox"/> Property Investment	<input checked="" type="checkbox"/> Investment Holding	<input type="checkbox"/> Consultancy	<input type="checkbox"/> Import/Export
<input type="checkbox"/> Trading	<input type="checkbox"/> Manufacturing	<input type="checkbox"/> Others (please specify): _____	
(ii) Please provide a brief description of Company's business activities: <u>Finance Investment, Management</u>			
Source of Funds:	<input checked="" type="checkbox"/> Personal Assets of Beneficial Owner	<input type="checkbox"/> Public Listing	<input checked="" type="checkbox"/> Borrowings/Loans
<input type="checkbox"/> Others (please specify) : _____			
<u>Beneficial Owner / Applicant for Business</u>			
(a) Full Name:	GUO QIANG		
(b) Business address:	Room 2106, Yardley Commercial Building, No 3 Connaught Road West, Sheung Wan, Hong Kong		
(c) Permanent Residential Address:	MAJESTIC VIEW MANOR, 20 SOUTH BAY ROAD, HONG KONG		
(d) Telephone:	2160 0816 / 2160 0888		
(e) Fax:	2160 0808		
(f) Email:	hk.company.secretary@gmail.com		
(g) Date of Birth:	1987-02-22		
(h) Nationality:	HONG KONG		
(i) Occupation:	MANAGER		
Please attach: (1) a <u>certified copy</u> * of Current Passport or Identity Card; and (2) One of the following: - Residential address proof (e.g. <u>original</u> or <u>certified copy</u> * of utility bill / bank statement); or - Reference from bank or qualified professional (see attached sample wording)			
* Copy may be certified by Lawyer/CPA/Bank in the attached format			
I / We confirm that the above information is true and accurate, and you are authorised to supply any or all of such information for due diligence purposes to the Regulators if so requested by them. We also undertake to notify you of any future changes to the above information.			
Client Signature:	Print Name: GUO QIANG		
Date: 2017-07-01			

Please return this form and attachments to:
Compliance Department
Vistra Hong Kong
19/F, Lee Garden One, 33 Hysan Avenue, Causeway Bay, Hong Kong



CERTIFIED TRUE COPY

I, the undersigned, hereby certify that this document is a true and complete copy of the original or a properly certified true copy of the original

Dated 1 JULY 2017

Diana Yiu

YU FIONA KA WING

Barrister, Hong Kong SAR



HSBC Premier

Premier Credit Card Statement 卓越理財信用卡結單

Page 01/02

MR GUO QIANG
MAJESTIC VIEW MANOR
MAJESTIC VIEW MANOR
20 SOUTH BAY ROAD
HONG KONG

I
00115

ABDABD47

Account number 戶口號碼	
PREMIER CREDIT CARD	HKD40,000.00
Statement date 結單日 17 JUN 2017	Statement balance 結單結欠 / 結餘 HKD390,000.00CR

0000115

Post date 記帳日期	Trans date 交易日期	Description of transaction 交易說明	Amount (HKD) 金額	
		PREVIOUS BALANCE 上月結欠 / 結餘 Note: "CR" means Credit transaction / balance 註: 「CR」為入帳交易 / 結餘	390,000.00CR	
		STATEMENT BALANCE 結單結欠 / 結餘	390,000.00CR	
		***** FEES AND CHARGES SUMMARY *****		
		FEE/CHARGE TYPE	AMOUNT	
		TOTAL FEES/CHARGES (EXCLUDING FINANCE CHARGE)	0.00	
		***** FINANCE CHARGE SUMMARY *****		
		BALANCE TYPE	ANNUALISED PERCENTAGE RATE (APR)	FINANCE CHARGE
		CASH ADVANCE	37.75%	0.00
		PURCHASE	36.43%	0.00
		TOTAL FINANCE CHARGE		0.00

CERTIFIED TRUE COPY

I, the undersigned, hereby certify that
this document is a true and complete

Note : See reverse side for important information about your account. For more information, please call our Credit Cards Customer Service Hotline on (852) 2233 3322.

注意 : 請參閱背頁有關您戶口的重要資料。如有垂詢, 請聯絡本行
信用卡客戶服務熱線, 電話 : (852) 2233 3322。

Minimum payment summary 最低付款摘要	of the original or a copy
Current minimum payment due 目前最低付款額	0.00
Please pay by 須於此付款到期日或之前繳交	true copy of the original
Overdue / overlimit due now 須立即繳交的過期款項 / 超額款項	Dated 1 JUN 2017 0.00
Total minimum payment due 最低付款總額	0.00

Fiona Y
YU FIONA KA WING

Barrister, Hong Kong SAR

HSBC 滙豐 Payment Slip 付款存根

Account number 戶口號碼	Card type 信用卡類別
	PREMIER CREDIT CARD
Statement date 結單日 17 JUN 2017	Statement balance 結單結欠 / 結餘 HKD390,000.00CR
Cheque number 支票號碼	Amount enclosed 夾附金額

Tick box for change of correspondence address or telephone number.
See reverse side.
更改通訊地址或電話號碼, 請在此方格加 "X", 並參閱背頁說明。

If you are paying by mail, please detach this payment slip and return it with a crossed cheque made payable to "The Hongkong and Shanghai Banking Corporation Limited" or "HSBC" at least three working days before the payment due date to our Centre, PO BOX NO. 73730, KOWLOON CENTRAL POST OFFICE HK. Please write your account number on the back of the cheque. 如欲以郵寄方式付款, 請撕下此付款存根, 於付款到期日三個工作天前, 連同以「香港上海滙豐銀行有限公司」或「滙豐」為抬頭的劃線支票, 寄回 PO BOX NO. 73730, KOWLOON CENTRAL POST OFFICE HK. 信用卡中心收, 請於支票背面寫上您的戶口號碼。

Fiona Yu
Director
Legal & Compliance

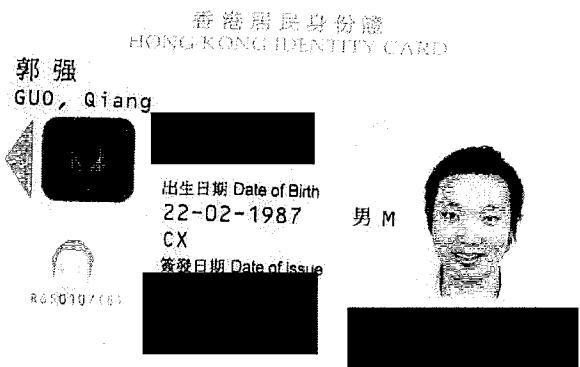


ACA Capital Group Limited

49/F, Bank of China Tower, No.1, Garden Road, Central, Hong Kong
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E. +852 2598 9288 E. fiona.yu@acacap.com
www.acacap.com

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適用於十八歲或
以上的大人



FOR A PERSON OF THE
AGE OF 18 OR OVER

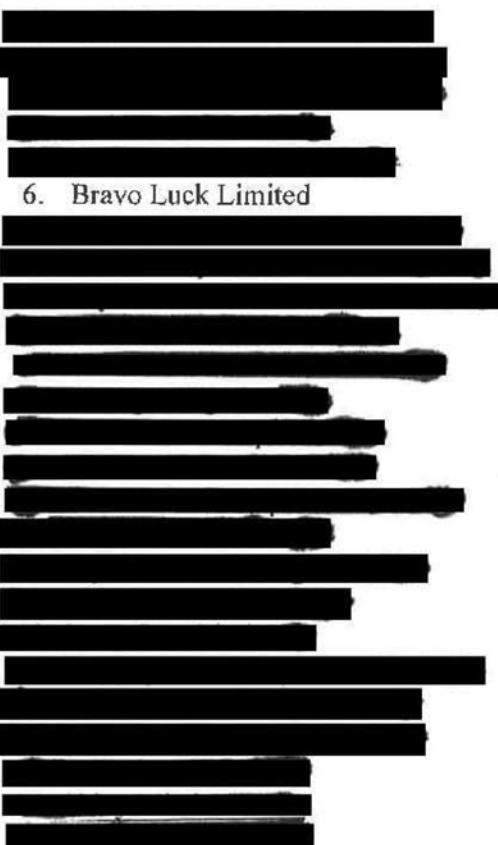
Dionne Boreland-Fearon

From: EricaCheng Office <EricaCheng.Office@sw-hk.com>
Sent: Monday, June 19, 2017 4:11 AM
To: Sunnie Fong
Cc: Erica Cheng
Subject: change of administrator

Dear Sunnie

This follow our telephone conversation. The new administrator of the below 25 BVI companies are Kingdom Rich Limited with effect from 19 June 2017:

6. Bravo Luck Limited



Andrew Willins

From: Shaheba Levons <shaheba.levons@ffp.vg>
Sent: 05 November 2020 14:59
To: Shaheba Levons
Subject: FW: Conflicts checking: New opportunity

From: Hadley Chilton
Sent: Tuesday, 26 February 2019 6:27 pm
To: Michael Pearson ; Andrew Childe ; Richard Lewis ; Chris Rowland ; Stephen Briscoe
Subject: Conflicts checking: New opportunity

<https://www.google.co.uk/amp/s/www.bloomberg.com/amp/news/articles/2018-08-16/chinese-tycoon-s-daughter-challenges-hong-kong-over-asset-freeze>

Please could you let me know if we have any conflicts in acting in respect of:

Alfonso Global Limited
Alfa Global Ventures Limited

Best

Hadley J Chilton

FFP

www.FFP.vg

+1284 542 6076

From: Lauren Williamson <lauren.williamson@walkersglobal.com>
Sent: Tuesday, February 26, 2019 6:19 pm
To: Hadley Chilton
Cc: Oliver Clifton; Matthew Cowman; Stephen Briscoe; Trecia Vanterpool-Durrant
Subject: RE: EXTERNAL New opportunity

External Email. Exercise Caution.

Many thanks Hadley

We look forward to hearing from you.

Kind regards

Lauren

Lauren Williamson
Associate

WALKERS

T+1 284 852 2273 | M +1 284 542 2273 | E lauren.williamson@walkersglobal.com

Bermuda* | **British Virgin Islands** | Cayman Islands | Dubai | Guernsey | Hong Kong | Ireland | Jersey | London | Singapore

From: Hadley Chilton [<mailto:Hadley.Chilton@ffp.vg>]

Sent: 26 February 2019 6:12 PM

To: Lauren Williamson <Lauren.Williamson@walkersglobal.com>

Cc: Oliver Clifton <Oliver.Clifton@walkersglobal.com>; Matthew Cowman <Matthew.Cowman@walkersglobal.com>;

Stephen Briscoe <stephen.briscoe@ffp.vg>; Trecia Vanterpool-Durrant <trecia.vanterpool-durrant@ffp.vg>

Subject: Re: EXTERNAL New opportunity

Thank you Lauren. We will run through our client acceptance and revert very soon.

Best regards

Hadley J Chilton

FFP

www.FFP.vg

+1284 542 6076

From: Lauren Williamson <lauren.williamson@walkersglobal.com>

Sent: Tuesday, February 26, 2019 5:47 pm

To: Hadley Chilton

Cc: Oliver Clifton; Matthew Cowman

Subject: EXTERNAL New opportunity

External Email. Exercise Caution.

Hi Hadley

Thank you for your time on the phone just now. As discussed, we have a new opportunity which we think will be of interest to FFP.

Walkers acts as Cayman counsel (and registered office) to ACA Investment Fund L.P. (the "**Fund**") - essentially a US\$12bn (equity, debt and assets) joint venture between Miles Kwok (via various holding companies) and Mubadala (Abu Dhabi's sovereign wealth fund – Walkers' client of record). The GP / manager of the Fund is ACA Investment Management Limited (the**Manager**) to which Walkers also provides registered office services.

The structure includes BVI holding companies which are LPs of the Fund, shareholders of the Manager or related entities / subsidiaries in the structure.

Vistra currently acts as BVI registered agent for the following BVI holding companies in the structure:

Alfonso Global Limited

Alfa Global Ventures Limited

Vistra served notice of their intention to resign as each company's registered agent on 14 December 2018 and their resignation will be effective on 14 March 2019.

We were wondering if FFP would be interested in acting as the registered agent of the companies listed above. FFP's appointment would need to take place on or before 14 March 2019.

We attach the following:

- recent BVI Court and company searches for each of the BVI holding companies (which includes the certificates of incorporation and memorandum and articles of association);
- the current registers of directors and shareholders of the BVI holding companies; and
- KYC we hold on file for the current directors/ shareholder of the BVI holding companies, being:
 - o Karin Maistrello

o Max Krasner

World-check (and related searches) have been run on the shareholders / directors of the BVI holding companies and we have had no WC hits on:

- Karin Maistrello
- Max Krasner

Your client of record would be: ACA Capital Group Limited

Do let us know if you have any questions.

Many thanks and kind regards

Lauren

Lauren Williamson
Associate

WALKERS

T+1 284 852 2273 | F+1 284 494 5535 | M +1 284 542 2273 | E lauren.williamson@walkersglobal.com | [vCard](#) | [Biography](#)

171 Main Street, PO Box 92, Road Town, Tortola, British Virgin Islands VG1110
www.walkersglobal.com

Secretary

Wandamae Malone | T +1 284 852 2218 | E wandamae.malone@walkersglobal.com

Bermuda* | **British Virgin Islands** | Cayman Islands | Dubai | Guernsey | Hong Kong | Ireland | Jersey | London | Singapore

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WALKERS' DISCLAIMER: The information in this email may be confidential, legally privileged and exempt from disclosure

Andrew Willins

From: Gumbs, Lynelle <Lynelle.Gumbs@harneys.com>
Sent: 02 November 2020 16:34
To: Andrew Willins
Cc: Munro, Ross; Payne, Macia; Mellor, Anjali
Subject: [EXTERNAL] Email #4 - Bravo Luck Limited - Company Register [HARNEYS-BVI.HCS.BRAVOLUCKL]

This Message originated outside your organization.

CONFIDENTIAL

See below

Lynelle Gumbs
Corporate Services Assistant Manager | British Virgin Islands

D +1 284 852 4344 | **E** lynelle.gumbs@harneys.com

Harneys Corporate Services Limited, Craigmuir Chambers, PO Box 71, Road Town, Tortola VG1110, British Virgin Islands.
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From: Tom Keya
Sent: 23 September 2020 14:20
To: Ward-Lewis, Indira
Cc: Andreas Hadjipavlis ; Graham, Ester
Subject: Re: Bravo Luck Limited - Company Register [HARNEYS-BVI.HCS.BRAVOLUCKL]

EXTERNAL EMAIL

Bravo Luck - London.

Qiang - we have placed his address as director. We do not think this should be an issue but are happy to change it to the proof of address if need be. We can amend the form manually or give you consent to do so.

The individual is an entrepreneur - he is not employed. He is looking for opportunities with this business hence why it is essential we close it ASAP.

I will get the form to you shortly - however - we need this company restored by tomorrow as the client is engaged in discussions for a potential project.

Can I please ask that this is given the most urgent attention?

On 23 Sep 2020, at 18:35, Ward-Lewis, Indira wrote:

Dear Andreas

Compliance has requested as follows:

Bravo Luck Limited

- Please specify where in Europe the activities will take place.

Qiang Guo

- Please provide a completed Self Declaration Form (attached).
- The residential address provided on the compliance questionnaire and utility bill are different. Please clarify.
- The occupation for the individual states "Director". Please confirm where the individual is employed.

We look forward to your response.

Regards

Indira Ward-Lewis

Corporate Services Assistant Manager

indira.ward-lewis@harneys.com

D +1 284 852 4311

M +1 284 340 0371

British Virgin Islands

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From: Ward-Lewis, Indira

Sent: 23 September 2020 09:44

To: 'Andreas Hadjipavlis' ; Tom Keya

Cc: Graham, Ester

Subject: RE: Bravo Luck Limited - Company Register [HARNEYS-BVI.HCS.BRAVOLUCKL]

Dear Andreas

Please note that the matter is still under review by Compliance. A follow-up email will be sent to Compliance to ascertain the status.

Regards

Indira Ward-Lewis

Corporate Services Assistant Manager

indira.ward-lewis@harneys.com

D +1 284 852 4311

M +1 284 340 0371

British Virgin Islands

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From: Andreas Hadjipavlis <andreashadjipavlis@berkeleyrowe.com>

Sent: 23 September 2020 05:13

To: Ward-Lewis, Indira <indira.ward-lewis@harneys.com>; Tom Keya <TomKeya@berkeleyrowe.com>

Cc: Graham, Ester <Ester.Graham@harneys.com>

Subject: RE: Bravo Luck Limited - Company Register [HARNEYS-BVI.HCS.BRAVOLUCKL]

EXTERNAL EMAIL

Dear Indira,

I hope this email finds you well.

Please could you advise us if your Compliance team has reviewed our application, as this is a matter of urgency.

Many thanks and I look forward to hearing from you.

Kind regards,

Andreas

ANDREAS HADJIPAVLIS

Paralegal

Email: andreashadjipavlis@berkeleyrowe.com

Office: +44 203 7868965

Park House, 116 Park Street, W1K 6SS

Important – Payments to Berkeley Rowe Ltd

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From: Ward-Lewis, Indira [<mailto:indira.ward-lewis@harneys.com>]

Sent: 22 September 2020 15:16

To: Tom Keya <TomKeya@berkeleyrowe.com>

Cc: Andreas Hadjipavlis <andreashadjipavlis@berkeleyrowe.com>; Graham, Ester <Ester.Graham@harneys.com>

Subject: RE: Bravo Luck Limited - Company Register [HARNEYS-BVI.HCS.BRAVOLUCKL]

Dear Tom

I confirm that the application has been submitted to Compliance for their consideration. We will revert once the review process is completed.

Regards

Indira Ward-Lewis

Corporate Services Assistant Manager

indira.ward-lewis@harneys.com

D +1 284 852 4311

M +1 284 340 0371

British Virgin Islands

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From: Tom Keya <TomKeya@berkeleyrowe.com>

Sent: 22 September 2020 08:42

To: Ward-Lewis, Indira <indira.ward-lewis@harneys.com>

Cc: Andreas Hadjipavlis <andreashadjipavlis@berkeleyrowe.com>

Subject: FW: Bravo Luck Limited - Company Register [HARNEYS-BVI.HCS.BRAVOLUCKL]

EXTERNAL EMAIL

Dear Indra

We have taken instructions from our client. This company holds no assets. It is purely a paper company for contractual negotiations.

It operates in Europe and USA.

I hope this helps.

Tom

Begin forwarded message:

From: "Ward-Lewis, Indira" <indira.ward-lewis@harneys.com>

Date: 21 September 2020 at 19:18:58 BST

To: Andreas Hadjipavlis <andreashadjipavlis@berkeleyrowe.com>

Cc: "Graham, Ester" <Ester.Graham@harneys.com>

Subject: Bravo Luck Limited - Company Register [HARNEYS-BVI.HCS.BRAVOLUCKL]

Dear Andreas

Thank you for your email.

Can you please elaborate on the nature of business listed in the transfer pack. In addition, can you please provide specific countries in Europe and Asia where the company will be conducting business. In addition, please provide us with the names of the companies and jurisdictions for which the above company is holding shares.

We look forward to your response.
Regards

Indira Ward-Lewis

Corporate Services Assistant Manager

indira.ward-lewis@harneys.com

D +1 284 852 4311

M +1 284 340 0371

British Virgin Islands

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From: Andreas Hadjipavlis <andreashadjipavlis@berkeleyrowe.com>

Sent: 18 September 2020 12:31

To: Ward-Lewis, Indira <[indira.ward-leewis@harneys.com](mailto:indira.ward-lewis@harneys.com)>

Subject: RE: Bravo Luck Limited - Company Register [HARNEYS-BVI.FID270563]

EXTERNAL EMAIL

Dear Indira,

I hope this email finds you well.

Further to my previous email earlier today, please find the following documents stored on One Drive at this link: <https://berkeleyrowe-my.sharepoint.com/:f/p/andreashadjipavlis/EgSVxlhnCrhKiZA7kD4pPMUBOxdHD41cHVQRyp5p8kNLsA?e=iLchT>

1. Certificate of Incorporation;
2. Memorandum and Articles of Incorporation;
3. Register of Members;
4. Register of Directors;
5. Qiang Guo Share Certificate;
6. Company Certificate of Guarantee of Quality;
7. Due Diligence Documentation on Qiang Guo;
8. Individual Compliance Form - Qiang Guo;
9. Company Compliance Form – Bravo Luck Limited; and
10. Completed/executed Transfer Pack.

I have attempted to send you a zip folder but there seems to be an issue with Harneys' email server. Please could you acknowledge receipt of these documents by responding to this email.

Many thanks and please let me know, as a matter of urgency, if you require any further documentation/information.

Kind regards,

Andreas

ANDREAS HADJIPAVLIS

Paralegal

Email: andreas.hadjipavlis@berkeleyrowe.com

Office: +44 203 7868965

Park House, 116 Park Street, W1K 6SS

Important – Payments to Berkeley Rowe Ltd

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From: Ward-Lewis, Indira <indira.ward-lewis@harneys.com>

Sent: 18 September 2020 16:54

To: Andreas Hadjipavlis <andreas.hadjipavlis@berkeleyrowe.com>

Cc: Tom Keya <TomKeya@berkeleyrowe.com>; Akbar Ali

<akbarali@berkeleyrowe.com>; Dawson, Sabrina

<Sabrina.Dawson@harneys.com>; Graham, Ester

<Ester.Graham@harneys.com>

Subject: RE: Bravo Luck Limited - Company Register [HARNEYS-BVI.FID270563]

Dear Andreas

I am well and I trust the same for you.

A copy of the invoice is attached for your settlement.

Regards

Indira Ward-Lewis

Corporate Services Assistant Manager

indira.ward-lewis@harneys.com

D +1 284 852 4311

M +1 284 340 0371

British Virgin Islands

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From: Andreas Hadjipavlis <andreas.hadjipavlis@berkeleyrowe.com>
Sent: 18 September 2020 10:59 AM
To: Ward-Lewis, Indira <indira.ward-lewis@harneys.com>
Cc: Tom Keya <TomKeya@berkeleyrowe.com>; Akbar Ali <akbarali@berkeleyrowe.com>; Dawson, Sabrina <Sabrina.Dawson@harneys.com>; Graham, Ester <Ester.Graham@harneys.com>
Subject: RE: Bravo Luck Limited - Company Register [HARNEYS-BVI.FID270563]

EXTERNAL EMAIL

Dear Indira,

I hope this email finds you well.

Further to my previous email, please could you kindly provide me with an invoice for your fees. We are keen to pay and this is a matter of urgency for us as we need to secure the company Bravo Luck Limited and begin the process for the company to be restored back onto the company register.

Many thanks and I look forward to hearing from you.

Kind regards,

Andreas

ANDREAS HADJIPAVLIS

Paralegal

Email: andreas.hadjipavlis@berkeleyrowe.com

Office: +44 203 7868965

Park House, 116 Park Street, W1K 6SS

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From: Andreas Hadjipavlis
Sent: 17 September 2020 11:55
To: Ward-Lewis, Indira <indira.ward-lewis@harneys.com>
Cc: Tom Keya <TomKeya@berkeleyrowe.com>; Akbar Ali <akbarali@berkeleyrowe.com>; Dawson, Sabrina <Sabrina.Dawson@harneys.com>; Graham, Ester <Ester.Graham@harneys.com>

Subject: Re: Bravo Luck Limited - Company Register [HARNEYS-BVI.FID270563]

Dear Indira,

Thank you for your email and the below information.

Please take this email as acceptance of the fee of \$130.00 and please kindly provide me with an invoice for this.

I will follow up with the requested documents shortly.

Many thanks for your time.

Kind regards,

Andreas

On 16 Sep 2020, at 20:50, Ward-Lewis, Indira <indira.ward-lewis@harneys.com> wrote:

Dear Andreas

It appears that the above company was struck off the register of companies as the registered agent resigned. In order to obtain the fees due, we will have to conduct a company search at a cost of \$130.00. Please confirm your acceptance of this fee and I will provide you with our invoice for settlement.

In order for Harneys Corporate Services to provide Registered Office/Agent services for the company, we must obtain compliance approval. Therefore, please provide us with the following to begin the compliance review.

- Completed/executed Transfer Pack (attached)
- Due diligence documentation on each director, shareholder (holding 10% or more) and beneficial owner (holding 10% or more)
- Certificate of Incorporation
- Memorandum and Articles of Association (including any amendments)
- Register of Members
- Register of Directors
- Register of Officers (if any)
- Latest stamped Register of Directors
- Copy of the seal imprint

I trust that the foregoing proves helpful and if you have any questions please do not hesitate to contact us.

Regards

Indira Ward-Lewis

Corporate Services Assistant Manager

indira.ward-lewis@harneys.com

D +1 284 852 4311

M +1 284 340 0371

British Virgin Islands

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From: Andreas Hadjipavlis

[<andreas.hadjipavlis@berkeleyrowe.com>](mailto:andreas.hadjipavlis@berkeleyrowe.com)

Sent: 16 September 2020 10:37 AM

To: Ward-Lewis, Indira [<indira.ward-lewis@harneys.com>](mailto:indira.ward-lewis@harneys.com)

Cc: Tom Keya [<TomKeva@berkeleyrowe.com>](mailto:TomKeva@berkeleyrowe.com); Akbar Ali
[<akbarali@berkeleyrowe.com>](mailto:akbarali@berkeleyrowe.com)

Subject: RE: Re: Bravo Luck Limited - Company Register

EXTERNAL EMAIL

Dear Indira,

I hope this email finds you well.

I wanted to follow up on my below email as a matter of urgency.

I would really appreciate your assistance on this and look forward to hearing from you.

Kind regards,

Andreas

ANDREAS HADJIPAVLIS

Paralegal

Email: andreas.hadjipavlis@berkeleyrowe.com

Office: +44 203 7868965

Park House, 116 Park Street, W1K 6SS

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From: Andreas Hadjipavlis
Sent: 16 September 2020 11:21
To: Ward-Lewis, Indira <indira.ward-lewis@harneys.com>
Cc: Tom Keya <TomKeya@berkeleyrowe.com>; Akbar Ali <akbarali@berkeleyrowe.com>

Subject: Re: Bravo Luck Limited - Company Register

Importance: High

Dear Indira,

I hope this email finds you well.

I am writing to you in relation to the company, Bravo Luck Limited. To confirm, the director and shareholder of this company is Qiang Guo.

Please could you kindly confirm if the company continues to be on the company register and, in the event that it has been struck off the register, please could it be reinstated as a matter of urgency.

Many thanks and I look forward to hearing from you.

Kind regards,

Andreas

ANDREAS HADJIPAVLIS

Paralegal

Email: andreas.hadjipavlis@berkeleyrowe.com

Office: +44 203 7868965

Park House, 116 Park Street, W1K 6SS

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Andrew Willins

From: Gumbs, Lynelle <Lynelle.Gumbs@harneys.com>
Sent: 02 November 2020 16:43
To: Andrew Willins
Cc: Munro, Ross; Payne, Macia; Mellor, Anjali
Subject: [EXTERNAL] Email#12 - Qiang Guo - Bravo Luck Limited [HARNEYS-BVI.HCS.BRAVOLUCKL]

This Message originated outside your organization.

CONFIDENTIAL

See below

Lynelle Gumbs
Corporate Services Assistant Manager | British Virgin Islands

D +1 284 852 4344 | **E** lynelle.gumbs@harneys.com

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From: Albana Kuteli
Sent: 13 October 2020 04:19
To: Ward-Lewis, Indira
Cc: Graham, Ester ; Tom Keya ; Lydia Cheng
Subject: RE: Qiang Guo - Bravo Luck Limited [HARNEYS-BVI.HCS.BRAVOLUCKL]

EXTERNAL EMAIL

Hi Indira

Please see below responses in red:

- Residential Address: Flat 6, 5 Princes Gate; London SW7 1QJ, United Kingdom. **Correct. Please confirm this will not be a matter of public record.**
- Duration of residence at his residential address: **5 years.**
- Job: An entrepreneur - he is not employed
- Any business connection to China and any address in China: **None**

Many thanks.

Kind regards,

ALBANA KUTELI

Associate

Email: albanakuteli@berkeleyrowe.com

Office: +44 203 7868965

Park House, 116 Park Street, W1K 6SS



Important – Payments to Berkeley Rowe Ltd

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From: Ward-Lewis, Indira [<mailto:indira.ward-lewis@harneys.com>]

Sent: 12 October 2020 16:25

To: Albana Kuteli

Cc: Graham, Ester ; Tom Keya

Subject: RE: Qiang Guo - Bravo Luck Limited [HARNEYS-BVI.HCS.BRAVOLUCKL]

Thanks Albana. I look forward to your response shortly.

Regards

Indira Ward-Lewis

Corporate Services Assistant Manager | British Virgin Islands

D +1 284 852 4311 | **M** +1 284 340 0371 | **E** indira.ward-lewis@harneys.com

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From: Albana Kuteli <AlbanaKuteli@berkeleyrowe.com>

Sent: 12 October 2020 11:22

To: Ward-Lewis, Indira <indira.ward-lewis@harneys.com>

Cc: Graham, Ester <Ester.Graham@harneys.com>; Tom Keya <TomKeya@berkeleyrowe.com>

Subject: RE: Qiang Guo - Bravo Luck Limited [HARNEYS-BVI.HCS.BRAVOLUCKL]

EXTERNAL EMAIL

Hi Indira

We are awaiting confirmation from the client and will revert as soon as we can.

Kind regards,

ALBANA KUTELI

Associate

Email: albanakuteli@berkeleyrowe.com

Office: +44 203 7868965

Park House, 116 Park Street, W1K 6SS



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From: Ward-Lewis, Indira [<mailto:indira.ward-lewis@harneys.com>]

Sent: 12 October 2020 16:19

To: Tom Keya <TomKeya@berkeleyrowe.com>; Albana Kuteli <AlbanaKuteli@berkeleyrowe.com>

Cc: Graham, Ester <Ester.Graham@harneys.com>

Subject: RE: Qiang Guo - Bravo Luck Limited [HARNEYS-BVI.HCS.BRAVOLUCKI]

Importance: High

Dear Tom/Albana

Can I please have a response to my email dated 7 October; which is highlighted below.

Regards

Indira Ward-Lewis

Corporate Services Assistant Manager | British Virgin Islands

D +1 284 852 4311 | **M** +1 284 340 0371 | **E** indira.ward-lewis@harneys.com

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From: Ward-Lewis, Indira

Sent: 08 October 2020 15:43

To: 'Tom Keya' <TomKeya@berkeleyrowe.com>; 'Albana Kuteli' <AlbanaKuteli@berkeleyrowe.com>

Cc: Graham, Ester <ester.graham@harneys.com>

Subject: RE: Qiang Guo - Bravo Luck Limited [HARNEYS-BVI.HCS.BRAVOLUCKL]

Dear All

A gentle reminder to my email of 7 October (see below).

Regards

Indira Ward-Lewis

Corporate Services Assistant Manager | British Virgin Islands

D +1 284 852 4311 | **M** +1 284 340 0371 | **E** indira.ward-lewis@harneys.com

harneysfiduciary.com | harneys.com

British Virgin Islands | Cayman Islands | Cyprus | Hong Kong | London | Miami | Montevideo | São Paulo | Shanghai | Singapore | Vancouver

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Harneys Corporate Services Limited, Craigmuir Chambers, PO Box 71, Road Town, Tortola VG1110, British Virgin Islands.
This email is confidential and may be subject to legal professional privilege. [Read more](#)

From: Ward-Lewis, Indira

Sent: 07 October 2020 3:33 PM

To: 'Tom Keya' <TomKeya@berkeleyrowe.com>; Albana Kuteli <AlbanaKuteli@berkeleyrowe.com>

Cc: Graham, Ester <ester.graham@harneys.com>

Subject: Qiang Guo - Bravo Luck Limited [HARNEYS-BVI.HCS.BRAVOLUCKL]

Dear Tom/Albana

Can you please provide us with the following information/confirmation with respect to Mr Guo:

- Residential Address: **Flat 6, 5 Princes Gate; London SW7 1QJ, United Kingdom**
- Duration of residence at his residential address:
- Job: **An entrepreneur - he is not employed**
- Any business connection to China and any address in China:

We look forward to your response shortly.

Regards

Indira Ward-Lewis

Corporate Services Assistant Manager | British Virgin Islands

D +1 284 852 4311 | **M** +1 284 340 0371 | **E** indira.ward-lewis@harneys.com

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Andrew Willins

From: Gumbs, Lynelle <Lynelle.Gumbs@harneys.com>
Sent: 03 November 2020 08:20
To: Andrew Willins
Cc: Munro, Ross; Mellor, Anjali; Payne, Macia
Subject: [EXTERNAL] RE: Final Emails & Attachments - Docs for Bravo Luck [APPLEBY-VG_LEGAL.FID184031] [HARNEYS-BVI.HCS.BRAVOLUCKL]

This Message originated outside your organization.

CONFIDENTIAL

Good Morning Andrew

Had a second look but unfortunately there is no evidence of any instruments of transfer on files.

I will provide our invoice in a short while.

Kind regards

Lynelle Gumbs
Corporate Services Assistant Manager | British Virgin Islands

D +1 284 852 4344 | **E** lynelle.gumbs@harneys.com

Harneys Corporate Services Limited, Craigmuir Chambers, PO Box 71, Road Town, Tortola VG1110, British Virgin Islands.
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From: Gumbs, Lynelle
Sent: 02 November 2020 19:13
To: 'Andrew Willins'
Cc: Munro, Ross ; Mellor, Anjali ; Payne, Macia
Subject: RE: Final Emails & Attachments - Docs for Bravo Luck [APPLEBY-VG_LEGAL.FID184031] [HARNEYS-BVI.HCS.BRAVOLUCKL]

Hi Andrew

I don't recall seeing any transfer instruments but let me have another go at our file in the morning.

I will come back tomorrow.

Regards

Lynelle Gumbs
Corporate Services Assistant Manager | British Virgin Islands

D +1 284 852 4344 | E lynelle.gumbs@harneys.com

Harneys Corporate Services Limited, Craigmuir Chambers, PO Box 71, Road Town, Tortola VG1110, British Virgin Islands.
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From: Andrew Willins <a.willins@applebyglobal.com>
Sent: 02 November 2020 4:22 PM
To: Gumbs, Lynelle <Lynelle.Gumbs@harneys.com>
Cc: Munro, Ross <Ross.Munro@harneys.com>; Mellor, Anjali <Anjali.Mellor@harneys.com>; Payne, Macia <macia.payne@harneys.com>
Subject: RE: Final Emails & Attachments - Docs for Bravo Luck [HARNEYS-BVI.HCS.BRAVOLUCKL] [APPLEBY-VG_LEGAL.FID184031]

EXTERNAL EMAIL

Lynelle

This is much appreciated, thank you.

Don't forget to send me a note of your charges. It would also be helpful if you could confirm whether you have any Instruments of Transfer on file (if you still have access to that data room, was anything of that description uploaded there, or did you download everything that was on it)?

Many thanks

Andrew

Andrew Willins
Partner, Practice Group Head | Dispute Resolution
Appleby (BVI) Limited
Tel: +1 284 393 5323

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applebyglobal.com



From: Gumbs, Lynelle [<mailto:Lynelle.Gumbs@harneys.com>]
Sent: 02 November 2020 16:47
To: Andrew Willins
Cc: Munro, Ross; Mellor, Anjali; Payne, Macia
Subject: [EXTERNAL] Final Emails & Attachments - Docs for Bravo Luck [APPLEBY-VG_LEGAL.FID184031] [HARNEYS-BVI.HCS.BRAVOLUCKL]

This Message originated outside your organization.

CONFIDENTIAL

Hi Andrew

To the best of my knowledge, I believe that I have sent you what we have on file for this entity.

If you have any queries please do let me know and I am happy to look for whatever else you may be in need of, should we have it in our possession.

Have a good evening!

Kind regards

Lynelle Gumbs

Corporate Services Assistant Manager | British Virgin Islands

D +1 284 852 4344 | **E** lynelle.gumbs@harneys.com

Harneys Corporate Services Limited, Craigmuir Chambers, PO Box 71, Road Town, Tortola VG1110, British Virgin Islands.
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From: Gumbs, Lynelle
Sent: 02 November 2020 17:25
To: 'Andrew Willins' <a.willins@applebyglobal.com>
Cc: Munro, Ross <ross.munro@harneys.com>; Mellor, Anjali <anjali.mellor@harneys.com>; Payne, Macia <macia.payne@harneys.com>
Subject: RE: Part 1 x 9 - CDD for Bravo Luck [APPLEBY-VG_LEGAL.FID184031] [HARNEYS-BVI.HCS.BRAVOLUCKL]

CONFIDENTIAL

Hi Andrew

Unfortunately that is exactly how it was received by our Onboarding team.

You will note that it appears as though the date is missing and you may look at the upper right hand that shows the date.

Let me know if this helps.

Regards

Lynelle Gumbs

Corporate Services Assistant Manager | British Virgin Islands

D +1 284 852 4344 | **E** lynelle.gumbs@harneys.com

Harneys Corporate Services Limited, Craigmuir Chambers, PO Box 71, Road Town, Tortola VG1110, British Virgin Islands.
This email is confidential and may be subject to legal professional privilege. [Read more](#)

From: Andrew Willins <awillins@applebyglobal.com>
Sent: 02 November 2020 17:22
To: Gumbs, Lynelle <Lynelle.Gumbs@harneys.com>
Cc: Munro, Ross <Ross.Munro@harneys.com>; Mellor, Anjali <Anjali.Mellor@harneys.com>; Payne, Macia <macia.payne@harneys.com>
Subject: RE: Part 1 x 9 - CDD for Bravo Luck [HARNEYS-BVI.HCS.BRAVOLUCKL] [APPLEBY-VG_LEGAL.FID184031]

EXTERNAL EMAIL

Hi Lynelle

Part 1 received, with many thanks.

Sorry to start being a pest before the others come in, but I note that the Register of Members and Directors seem to be cut off on the left hand side of the page - it looks like landscape has been photocopied the wrong way round. Do you have a better copy?

If it's with the other 8 emails (not yet received) ignore me and I will wait until I have them.

Best wishes

Andrew

Andrew Willins
Partner, Practice Group Head | Dispute Resolution
Appleby (BVI) Limited
Tel: +1 284 393 5323

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applebyglobal.com



From: Gumbs, Lynelle [<mailto:Lynelle.Gumbs@harneys.com>]
Sent: 02 November 2020 15:55
To: Andrew Willins
Cc: Munro, Ross; Mellor, Anjali; Payne, Macia
Subject: Part 1 x 9 - CDD for Bravo Luck [HARNEYS-BVI.HCS.BRAVOLUCKL]

Your attachments have been security checked by Mimecast Attachment Protection. Files where no threat or malware was detected are attached.

CONFIDENTIAL

Part 1 - included:

- Compliance Questionnaire – Companies)
- BVI Transfer in Pack
- Certificate of Incorporation
- Memorandum & Articles of Association
- Register of Directors
- Register of Members
- Qiang Guo - Passport
- Revolut GBP Statement
- Qiang Guo - Self Declaration Letter

Kind regards

Lynelle Gumbs

Corporate Services Assistant Manager | British Virgin Islands

D +1 284 852 4344 | **E** lynelle.gumbs@harneys.com

Harneys Corporate Services Limited, Craigmuir Chambers, PO Box 71, Road Town, Tortola VG1110, British Virgin Islands.
This email is confidential and may be subject to legal professional privilege. [Read more](#)

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Appleby (BVI) Limited (the Legal Practice) is a company limited by shares incorporated in the British Virgin Islands. The term “Partner” is a title referring to a director, shareholder or an employee of the Legal Practice. Legal services are supplied by Legal Practitioners admitted to the Roll and authorised to practice in the British Virgin Islands.

The information in this e-mail is confidential and may be legally privileged. It is intended solely for the addressee. Access by any other person to this e-mail is not authorised. If you are not the intended recipient, please delete this e-mail. Any disclosure of this e-mail or of the parties to it, any copying, distribution or any action taken or omitted to be taken in reliance on it is prohibited, and may be unlawful.

Appleby (BVI) Limited (the Legal Practice) is a company limited by shares incorporated in the British Virgin Islands. The term “Partner” is a title referring to a director, shareholder or an employee of the Legal Practice. Legal services are supplied by Legal Practitioners admitted to the Roll and authorised to practice in the British Virgin Islands.

BRAVO LUCK LIMITED

(a BVI Business Company with BC Number **1767862**)
(the "**Company**")

WRITTEN RESOLUTION OF THE DIRECTORS/~~MANAGERS~~ **OF THE COMPANY PURSUANT TO THE
ARTICLES OF ASSOCIATION OF THE COMPANY**

We, the undersigned, being all the directors of the Company DO HEREBY ADOPT the following resolutions:

NOTICE OF APPOINTMENT OF REGISTERED AGENT AND REGISTERED OFFICE

IT WAS NOTED that:

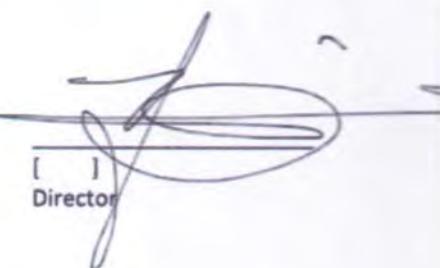
1. the Company does not have a Registered Agent or Registered Office; and
2. further to Section 91A of the Act, if at any time a company does not have a registered agent it shall forthwith, by resolution of members or directors, appoint a registered agent.

IT WAS RESOLVED that:

1. Harneys Corporate Services Limited of Craigmuir Chambers, P.O. Box 71, Road Town, Tortola, British Virgin Islands, be appointed as the Registered Agent of the Company;
2. Craigmuir Chambers, P.O. Box 71, Road Town, Tortola, British Virgin Islands, be appointed as the Registered Office of the Company; and
3. a notice in the approved form of the appointment of registered agent and registered office of the Company be filed with the BVI Registry of Corporate Affairs.

FURTHER RESOLVED that the Company's directors or officers, Harneys Corporate Services Limited and/or any person who is a legal practitioner employed by or a partner of Harney Westwood & Riegels, be and are hereby authorised to execute any forms or documents, submit any such forms or documents for filing at the BVI Registry of Corporate Affairs and take any and all actions necessary or desirable so as to give full effect to the appointment of registered agent and registered office.

Dated this 6 day of October, 2020.


[]
Director

f Company BRAVO LUCK LIMITED 尚運有限公司
ny Number 1767862

REGISTER OF MEMBERS

PLEASE NOTE: THE ORIGINAL OR COPY OF THIS REGISTER MUST BE KEPT AT THE OFFICE OF THE COMPANY'S REGISTERED AGENT. IF A COPY THEN PLEASE NOTIFY THE REGISTERED AGENT IN WRITING OF THE PHYSICAL ADDRESS OF THE ORIGINAL.

BVI 06

I	3	Class of Share	Ordinary	Par Value Per Share	US\$.100
---	---	----------------	----------	---------------------	----------

BRAVO LUCK LIMITED 尚運有限公司

NAME AND ADDRESS OF SHAREHOLDER		CERTIFICATE NUMBER	DISTINCTIVE NUMBERS		PAR VALUE PER SHARE
			FROM	TO	
GUO Qiang 郭強		1	-1-	-1-	US\$1.00
		DATE OF ISSUE		NO. OF SHARES	CONSIDERATION PAID
				-1-	US\$1.00

SHARE CERTIFICATE

OF

BRAVO LUCK LIMITED

尚運有限公司

INCORPORATED IN THE BRITISH VIRGIN ISLANDS

Authorised to issue a maximum of 50,000 Shares of a single class each with a par value of US\$1.00

THIS IS TO CERTIFY THAT THE UNDERMENTIONED PERSON IS THE REGISTERED HOLDER OF THE SHARES SPECIFIED HEREUNDER SUBJECT TO THE RULES AND LAWS GOVERNING THE ADMINISTRATION OF THE COMPANY

SHAREHOLDER	NO. OF SHARES	DISTINCTIVE NUMBERS		CERTIFICATE NUMBER	DATE OF ISSUE
		FROM	TO		
GUO Qiang 郭強	-1-	-1-	-1-	1	

GIVEN UNDER THE COMMON SEAL OF THE COMPANY ON THE DATE STATED ABOVE AND IN THE PRESENCE OF

EMM 154

NO TRANSFER OF ANY OF THE ABOVE SHARES CAN BE REGISTERED UNLESS ACCOMPANIED BY THIS CERTIFICATE

DIRECTOR/OFFICER/AUTHORISED PERSON

BVIPTBC 2006/03/40(PV)

of Company BRAVO LUCK LIMITED 尚運有限公司
pany Number 1767862

REGISTER OF DIRECTORS

No. 15

PLEASE NOTE: THE ORIGINAL OR COPY OF THIS REGISTER MUST BE KEPT AT THE REGISTERED OFFICE.

BVI 06

PART A - COMPANY

Name of the Company <i>(Note: Type the name <u>exactly</u> as listed on the Certificate of Incorporation/Registration)</i>	Bravo Luck Limited
Former Name(s) (if applicable)	N/A
Company Type	Company Limited by Shares
Current Registered Agent	N/A
Contact Details	N/A
Method of Change of registered office and agent	<input type="checkbox"/> I will arrange for the outgoing agent to file the transfer <input checked="" type="checkbox"/> I would like to arrange a 'forced transfer' by Harneys legal team
Reason for change of registered office and agent	Previous registered agent resigned.
Director's Resolution	Please click here for a template resolution to change the Company's registered agent.
Is the Company operating a non-profit/charity within the British Virgin Islands?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is the Company regulated by or registered with the Financial Services Commission?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Purpose of Company*(Note: Please be specific "holding Company" or "investment fund" is insufficient)*

Holding company that conducts investments in different businesses.

Intended nature of Company's business

Does the Company:

1. receive more than 20% of its revenue in the form of cash or equivalents?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
---	---

Is the company involved in:

2. the arms, defence, military or nuclear industries?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
3. trading oil and gas, precious metals, gems, jewels, fine art, real estate or other collectors' items?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
4. the use or provision of block chain technology, the creation and issuance of cryptocurrency and/or electronic tokens?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
5. the production or trading of substances or products?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
6. gambling or the adult entertainment industry?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

7.	activities that may have a major environmental impact (e.g. forestry, oil and gas, deep sea mining, quarrying or power generation)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
----	---	---

If you have answered YES to any of the questions above, please provide details.

N/A

If the intended nature of the Company's business is not identified above, please provide details.

N/A

Country(ies) of intended business activities

(Note: Please include location of customers, distributors and bank accounts.)

British Virgin Islands, Europe and Asia

Source of funds

(Note: Please provide details of the source of funding for the initial activities of the Company. You may be asked to provide supporting documentation.)

Business activities and private funds.

PART B - ECONOMIC SUBSTANCE

The Company may be required to have adequate substance¹ in the BVI.

Please click [here](#) to review Harneys guidance on economic substance requirements. If you have any queries please liaise with your usual Harneys contact.

Economic Substance Financial Reporting Period

Default reporting periods depend on the date of incorporation. If you have elected to use an economic substance reporting period end that is not your default date please tick here, and confirm the date of your reporting period end:

We have formally notified the ITA of a change to our economic substance reporting period, our current reporting period end is:

We would like to apply to make a change to our default reporting period. Harneys is able to arrange this notification – we will contact you to discuss what is possible to achieve and provide a quote.

If no box is ticked, the default reporting period will apply.

Does Company conduct:

1. banking business?	<input type="checkbox"/> Yes <input type="checkbox"/> No
2. distribution and service centre business?	<input type="checkbox"/> Yes <input type="checkbox"/> No
3. financing and leasing business?	<input type="checkbox"/> Yes <input type="checkbox"/> No
4. fund management business?	<input type="checkbox"/> Yes <input type="checkbox"/> No
5. headquarters business?	<input type="checkbox"/> Yes <input type="checkbox"/> No
6. holding company business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Please specify the types of asset(s) that the Company is intending to hold.	Shares in companies.

	Please provide details of any other legal entities in which the Company will hold interests (e.g. shares, partnership interests, etc.)	Companies limited by shares.
7.	<u>insurance business?</u>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
8.	<u>intellectual property business?</u>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
9.	<u>shipping business?</u>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

If you have answered YES to any of the questions above, please provide details.

(Note: The activities above may be 'relevant activities' for economic substance purposes. Please include as much detail as possible on the exact scope of any relevant activity.)

Investments in companies limited by shares.

Please confirm the entity's country(ies) of tax residence.	British Virgin Islands
--	------------------------

PART C - SHAREHOLDERS

(Note: Details of additional shareholders can be entered in Part I.)

Name of Shareholder	Qiang Guo	
Contact Details	00447889700337	mqgny123@gmail.com
Name of Shareholder	Name	
Contact Details	Telephone Number	Email Address
Name of Shareholder	Name	
Contact Details	Telephone Number	Email Address
Name of Shareholder	Name	
Contact Details	Telephone Number	Email Address

PART D - BENEFICIAL OWNER(S)

Note: Under the Beneficial Ownership Secure Search System Act, 2017 (BOSS Act), unless the Company is exempt, it is required to identify its beneficial owners and registrable legal entities and to notify its registered agent of the prescribed particulars of such persons. The registered agent is then obliged to establish and maintain a database with such particulars which may be made available for searching by the International Tax Authority. A beneficial owner under the BOSS Act is a natural person who: (i) ultimately owns or controls 25% or more of the shares or voting rights of the Company; or (ii) otherwise exercises control over the management of the Company. Any such person is referred to below as a "BOSS Act Beneficial Owner".

Please provide:

- (i) details of all beneficial owners of the Company who are interested in 10% or more of the Company (indicating which, if any, hold 25% or more or otherwise qualify as a BOSS Act Beneficial Owner); and
- (ii) details of all registrable legal entities of the Company.

Beneficial Owner Particulars - Natural Persons

Note: A beneficial owner under the Anti-Money Laundering Terrorist Financing Code of Practice, 2008 (AML Code) is a natural person who ultimately owns or controls 10% or more of the shares or voting rights of the Company.

First Name	Middle Name	Surname	Residential Address
Qiang		Guo	Majestic View Manor
Nationality	Date of Birth (DD/MM/YYYY)		20 South Bay Road
Chinese	22/02/1987		City _____ State _____
BOSS Act Beneficial Owner	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		Country _____ Post/Zip Code _____

First Name	Middle Name	Surname	Residential Address
			Address 1 _____
Nationality	Date of Birth (DD/MM/YYYY)		Address 2 _____
			City _____ State _____
BOSS Act Beneficial Owner	<input type="checkbox"/> Yes <input type="checkbox"/> No		Country _____ Post/Zip Code _____

First Name	Middle Name	Surname	Residential Address
			Address 1 _____
Nationality	Date of Birth (DD/MM/YYYY)		Address 2 _____
			City _____ State _____
BOSS Act Beneficial Owner	<input type="checkbox"/> Yes <input type="checkbox"/> No		Country _____ Post/Zip Code _____

First Name	Middle Name	Surname	Residential Address
			Address 1 _____
Nationality	Date of Birth (DD/MM/YYYY)		Address 2 _____
			City _____ State _____
BOSS Act Beneficial Owner	<input type="checkbox"/> Yes <input type="checkbox"/> No		Country _____ Post/Zip Code _____

Beneficial Owner Particulars - Registrable Legal Entities

Note: A registrable legal entity is a legal entity which would be a beneficial owner if it were a natural person and falls into one of

the following categories: (a) its securities are listed on a recognised stock exchange or a subsidiary of an entity the securities of which are so listed; (b) it is a BVI regulated investment fund or a subsidiary of such a fund; (c) it is a BVI regulated person or a foreign regulated person; or (d) it is a sovereign state or a wholly owned subsidiary of a sovereign state. Additional information may be requested.

Full Legal Name	Registered Address	
	Address 1	
Alternative Name(s) (if applicable)	Address 2	
	City	City
	Country	Country
Country of Registration		
Registration Number		
Date of incorporation	(DD/MM/YYYY)	
Name of Stock Exchange (if applicable)		
Name of Regulator (if applicable)		
Location of Beneficial Ownership Database	Address	
	Address 1	
	Address 2	
Beneficial Ownership Database	City	City
	Country	Country
Contact Details	Telephone Number	Email Address
Beneficial Owner - Exemption		
Will the company be an exempt person under the BOSS Act?		<input type="checkbox"/> Yes <input type="checkbox"/> No
If YES, on what basis?		
PART E - DIRECTOR(S)		
<p>Each director must sign and complete the relevant section in our Compliance Pack (Individuals or Companies or Others) together with a Consent to Act Form signed at their original date of appointment – if you need to reproduce this document please use this template (Individual Directors or Non-Individual Directors).</p> <p>Please refer to our Additional Services section for more information about our director services.</p> <p>(Note: Details of additional directors can be entered in Part I.)</p>		
Name of Director	Qiang Guo	
Contact Details	00447889700337	mqgny123@gmail.com

Name of Director	Name		
Contact Details	Telephone Number	Email Address	
Name of Director	Name		
Contact Details	Telephone Number	Email Address	
PART F - OFFICER(S)			
<i>(Note: Details of additional officers can be entered in Part I.)</i>			
Name of Officer	Qiang Guo		
Contact Details	00447889700337	mqgny123@gmail.com	
Name of Officer	Name		
Contact Details	Telephone Number	Email Address	
PART G - COMPLIANCE QUESTIONNAIRE			
Any natural person or corporate entity which is listed in one of the following sections must complete a Compliance Questionnaire:			
<input checked="" type="checkbox"/> Shareholders in Part C			
<input checked="" type="checkbox"/> Beneficial Owners in Part D			
<input type="checkbox"/> Registrable legal entities listed in Part D			
<input checked="" type="checkbox"/> Directors listed in Part E			
Please refer to our Compliance Pack (Individuals or Companies or Others).			
PART H - LOCATION OF ORIGINAL CORPORATE RECORDS			
<i>Note: It is a mandatory requirement for the Company to keep either: (i) the original; or (ii) a copy of the corporate records listed below at the office of its registered agent. The company must inform the registered agent if original corporate documents will be kept at an alternative address and update the registered agent within 14 days of any change in location of the original records.</i>			
Corporate Record	Harneys	Alternative Address	
Register of Members	<input checked="" type="checkbox"/>	Address 1	
		Address 2	
		City	State
		Country	Post/Zip Code
Contact Details	00447889700337	mqgny123@gmail.com	

Corporate Record	Harneys	Alternative Address
Register of Directors	<input checked="" type="checkbox"/>	<input type="text"/> <input type="text"/> <input type="text"/> City <input type="text"/> State <input type="text"/> Country <input type="text"/> Post/Zip Code
Contact Details	00447889700337	mqgny123@gmail.com
Corporate Record	Harneys	Alternative Address
Minutes and Resolutions of Directors and Members	<input checked="" type="checkbox"/>	<input type="text"/> <input type="text"/> <input type="text"/> City <input type="text"/> State <input type="text"/> Country <input type="text"/> Post/Zip Code
Contact Details	00447889700337	mqgny123@gmail.com
Corporate Record	Harneys	Alternative Address
Register of Charges	<input checked="" type="checkbox"/>	<input type="text"/> <input type="text"/> <input type="text"/> City <input type="text"/> State <input type="text"/> Country <input type="text"/> Post/Zip Code
Contact Details	00447889700337	mqgny123@gmail.com
<p><i>Note: Additional fees will be incurred annually by the Company which must be paid in advance if Harneys are required to maintain the original financial records.</i></p>		
Corporate Record	Harneys	Alternative Address
Financial records and underlying documentation	<input type="checkbox"/>	Majestic View Manor 20 South Bay Road <input type="text"/> City <input type="text"/> State Hong Kong <input type="text"/> Post/Zip Code
Contact Details	00447889700337	mqgny123@gmail.com
Harneys can also provide specialised Bookkeeping and Financial Statement preparation services. Would you like us to contact you with more information?		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
PART I - ADDITIONAL INFORMATION		

Note: Please use this space to provide us with any special instructions or additional information. Any work which is not within the scope of our services may be referred to our affiliate law firm, Harneys Westwood & Riegels LP, who will contact you directly.

N/A

PART J - PAYMENT INSTRUCTIONS AND BILLING

If you have not received a quote in relation to our services please contact our [New Business Team](#).

Method of payment: We accept payments via wire transfer and credit card. Please click [here](#) for our payment instructions and use the reference 'New Business' and the proposed name of the Company provided in Part A.

Instructing Agent/Client	Berkeley Rowe Limited	
Please indicate your method of payment	<input type="checkbox"/> Credit Card <input checked="" type="checkbox"/> Wire	
Billing Address	Marble Arch Park House 116 Park Street, Mayfair London City United Kingdom W1K 6SS	
Billing Email (Note: We only send invoices by email.)	tomkeya@berkeleyrowe.com	

PART K - DECLARATION AND UNDERTAKING

I declare that I have read the [Terms and Conditions](#) and request that Harneys Fiduciary proceed with the Transfer-In of the Company according to the details provided in this Pack and I am authorised by each data subject to provide their personal data to Harneys Fiduciary. I certify that the information provided in this Pack is true and correct to the best of my knowledge, and I undertake to inform Harneys Fiduciary promptly should any of the provided details change. I further confirm that no situation has occurred where I have reason to believe that there may be legal or tax issues in connection with this structure and the laws and institutions of any jurisdiction.

Full Name	Qiang Guo
Name of corporate entity (if applicable)	Bravo Luck Limited
Position with corporate entity (if applicable)	Shareholder
Signature	
Date	17/09/2020

ADDITIONAL SERVICES

Company Secretarial Services

Our company administration teams provide secretarial and administrative support including acting as company secretary throughout the life of a business or project. This includes maintenance of company records.

Nominee Shareholder Services & Trust Services

We provide nominee shareholder services. For clients interested in succession planning involving their BVI business company shares we would invite you to consider the use of our trust services. Our experienced team of private wealth practitioners can advise you on this process. One of the key benefits of succession planning through trusts is avoiding the time, cost and publicity associated with a BVI probate application.

Director Services

Harneys Fiduciary offers both corporate directors and qualified professionals who may be appointed to serve as directors of a BVI Company. Provision of director services is considered on a case by case basis, however, taking into consideration the type of company and its activities.

Bank Accounts

We work closely with numerous financial institutions in the BVI and internationally and can help you open a bank account for your new company quickly and efficiently. We can provide authorised signatories for bank accounts and maintain and keep your financial records.

Accounting Services

Harneys Fiduciary has its own in-house accounting team specialising in the provision of bookkeeping and accounting services to meet the needs of companies, limited partnerships and trusts.

Our accounting services include maintenance of financial records, preparation of monthly, quarterly, or annual management accounts, preparation of annual financial statements and liaising with external auditors and advisors as required.

We can also provide access to auditors and other specialists outside our firm if this is necessary to meet your particular needs. Our connections both locally in the BVI and internationally are numerous and well established.

Other Services

Harneys Fiduciary also provides other services including liquidation services, authorised representative services, safe custody, escrow and a wide range of corporate secretarial services provided on an ad-hoc basis.

If you have any questions or would like more information on any of the above services please contact us.

Compliance Questionnaire - Companies

HARNEYS

DUE DILIGENCE REQUIREMENTS - COMPANIES

In accordance with British Virgin Islands anti-money laundering legislation and regulations, Harneys is required to conduct due diligence. A simplified procedure may apply for legal entities that are regulated in a recognised jurisdiction or listed on a recognised stock exchange and/or entities where Harneys may already have the required information. If you think the company may be eligible for simplified due diligence, please contact us at Harneys. The form is interactive which means that you can complete it on-screen and click on links, but it can also be printed and completed by hand. Harneys reserves the right to make appropriate and reasonable requests for additional information as required.

CORPORATE DUE DILIGENCE

You will need to provide Harneys with copies of the following documentation:

- a. Certificate of Formation/Incorporation;
- b. Memorandum & Articles of Association (or equivalent governing institution)

REGISTERED OWNERSHIP AND CONTROL

Harneys will need to verify identity for directors, shareholders and ultimate beneficial owners. Please provide the following documentation:

- a. Register of Directors and Register of Shareholders (or equivalent, eg a Certificate of Incumbency)

Click here for access to the individual compliance questionnaire:

http://assets.harneys.com/docs/compliance_forms/Compliance_Requirements-Individuals.pdf

ULTIMATE BENEFICIAL OWNERSHIP

If the registered shares are held on behalf of a beneficial owner by a nominee, Harneys will also need to verify identity for such individual beneficial owners. Companies with several corporate layers of ownership and/or control will be asked to provide a certified structure chart, which enables us to understand who the individuals are behind the structures.

QUESTIONNAIRE

Please complete the compliance questionnaire for individuals; print, sign and scan a copy to your Harneys contact. The form is interactive which means that you can complete it on-screen and click on links, but it can also be printed and completed by hand. Your Harneys representative will be able to provide any assistance or guidance you may need. You must return this to Harneys along with the required documentation, such as proof of address and identity and any other information Harneys requested.

INFORMATION

To help ensure that your documents will meet the requirements, you may find our document certification cover letter useful. The template is easy to use and you can find it by clicking here:

http://assets.harneys.com/docs/Compliance_Forms/Document_Certification.pdf.

A certifier needs to be good standing and subject to enforced standards of professional conduct (such as a lawyer

Compliance Questionnaire - Companies

HARNEYS

or an accountant). If you would like to know more about our due diligence procedures, please contact us at Harneys who will be happy to help.

Harneys reserves the right to make reasonable requests for additional documentation from time to time ensure compliance with regulatory obligations.

Compliance Questionnaire - Companies

HARNEYS

COMPLIANCE INFORMATION									
Full legal name	Bravo Luck Limited								
Former name(s)	N/A								
Trading name(s) or aliases	Bravo Luck Limited								
Date of formation	(DD/MM/YYYY)								
Country of formation	British Virgin Islands								
Current country of registration (if different from above)	N/A								
Current registration number	1767862								
Country of tax residence	British Virgin Islands								
Place(s) of business/trading activity	British Virgin Islands								
Telephone number(s) (please include country prefix)	N/A								
Website and contact e-mail address(es)	N/A								
Registered Office address	<p>Bravo Luck Limited</p> <p>Road Town</p> <table border="1"> <tr> <td>Tortola</td> <td>County/State</td> </tr> <tr> <td>British Virgin Islands</td> <td>Post/Zip code</td> </tr> </table>	Tortola	County/State	British Virgin Islands	Post/Zip code				
Tortola	County/State								
British Virgin Islands	Post/Zip code								
Address for service of documents	<p>P.O. Box 957, Offshore Incorporations Centre</p> <p>Road Town</p> <table border="1"> <tr> <td>N/A</td> <td>County/State</td> </tr> <tr> <td>British Virgin Islands</td> <td>Post/Zip code</td> </tr> </table>	N/A	County/State	British Virgin Islands	Post/Zip code				
N/A	County/State								
British Virgin Islands	Post/Zip code								
Mailing address (if different from either address above)	<table border="1"> <tr> <td>Address 1</td> <td></td> </tr> <tr> <td>Address 2</td> <td></td> </tr> <tr> <td>City</td> <td>County/State</td> </tr> <tr> <td>Country</td> <td>Post/Zip code</td> </tr> </table>	Address 1		Address 2		City	County/State	Country	Post/Zip code
Address 1									
Address 2									
City	County/State								
Country	Post/Zip code								

Compliance Questionnaire - Companies

HARNEYS

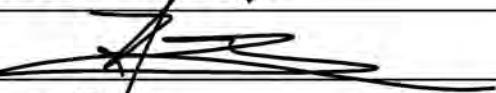
If the company offers public securities please indicate ticker symbol and name of stock exchange.	N/A
If the company is a licensed, authorised or regulated financial services firm, please indicate name of regulator and jurisdiction.	Company Limited by Shares
If the company is a professional practitioner (like an accountancy or legal firm) and subject to AML regulations, please indicate regulator and jurisdiction.	N/A
Director's statement as to the nature of the company's business Please provide the purpose of the company and a detailed description of its main activity(ies).	
Holding company that conducts investments in different businesses.	
Source of Funds Please provide a detailed description of the source of funding for the company.	
N/A	
Ultimate Beneficial ownership Please list the names of all Beneficial Owner(s) who own and/or control this entity	
N/A	

Compliance Questionnaire - Companies

HARNEYS

DECLARATION

I/We declare (as director(s) of the company) that the information provided in this form is, to the best of my/our knowledge and belief, accurate and complete. I/We undertake to advise Harneys promptly of any change in circumstances, which may cause any of the above provided particulars to be inaccurate or incomplete.

Signing on behalf of	Qiang Guo
Directors' quorum of the company	Quorum Present
Signature	
Name	Qiang Guo
Position/Capacity	Shareholder and Director
Date	17/09/2020



GBP Statement

Date: 1 Sep 2020 to 18 Sep 2020

Qiang Guo

Flat 6
5 Princes Gate
London
SW1QJ
United Kingdom

Report Lost or Stolen Card:

+44 20 3322 8352

Account Number: [REDACTED]
Sort Code: [REDACTED]

Account Summary

Total Balance as of 18 September £1,090.19

Card Payments	£95.27
Money Sent	£0.00
Money Received	£0.00
Top Up	£0.00
ATM Withdrawals	£0.00
Exchange In	£0.00
Exchange Out	£0.00
Revolut Fees	£12.99

We hereby certify this to be
a true copy of the original.



Berkeley Rowe Solicitors
116 Park St. London W1K 6SS
www.berkeleyrowe.com
020 3786 8965

Alastair A1
18/09/2020

Transactions

Completed Date	Description	Paid Out	Paid In	Balance
16 Sep	Uber *trip	£ 60.80		£1,090.19
16 Sep	Uber	£ 34.47		£1,150.99
14 Sep	Metal plan fee	£ 12.99		£1,185.46

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